

David B. Markowitz, OSB #742046
DavidMarkowitz@MarkowitzHerbold.com
Laura Salerno Owens, OSB #076230
LauraSalerno@MarkowitzHerbold.com
Harry B. Wilson, OSB #077214
HarryWilson@MarkowitzHerbold.com
Lauren F. Blaesing, OSB #113305
LaurenBlaesing@MarkowitzHerbold.com
Vivek A. Kothari, OSB #182089
VivekKothari@MarkowitzHerbold.com
MARKOWITZ HERBOLD PC
1455 SW Broadway, Suite 1900
Portland, OR 97201
Telephone: (503) 295-3085
Special Assistant Attorneys General for Defendants
Additional Counsel of Record Listed on Signature Page

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

WYATT B. and NOAH F. by their next friend
Michelle McAllister; KYLIE R. and ALEC R.
by their next friend Kathleen Megill Strek;
UNIQUE L. by her next friend Annette Smith;
SIMON S. by his next friend Paul Aubry;
RUTH T. by her next friend Michelle Bartov;
BERNARD C. by his next friend Ksen Murry;
NAOMI B. by her next friend Kathleen
Megill Strek; and NORMAN N. by his next
friend Tracy Gregg, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

TINA KOTEK, Governor of Oregon in her
official capacity; FARIBORZ
PAKSERESHT, Director, Oregon Department
of Human Services in his official capacity;
APRILLE FLINT-GERNER, Director, Child
Welfare in her official capacity; and OREGON
DEPARTMENT OF HUMAN SERVICES,

Defendants.

Case No. 6:19-cv-00556-AA

**DEFENDANTS' RESPONSE TO
PLAINTIFFS' OBJECTIONS TO
DEFENDANTS' TRIAL EXHIBIT
LIST**

Defendants submit the following responses to plaintiffs' objections to defendants' trial exhibits:

No.	Description	Plaintiffs' Objections	Defendants' Response
1001	Oregon Child Welfare Vision for Transformation (2020)		
1002	Oregon Child Welfare Vision for Transformation 2021 Update (July 2022)		
1003	Oregon Child Welfare Vision for Transformation 2022 Update (Oct. 2023)		
1004	ODHS Child Welfare 2023 Procedure Manual (rev. Aug. 23, 2023)		
1005	Governor Brown's Executive Order 19-03, Establishing an Oversight Board to Address the Crisis in Oregon's Child Welfare System (Apr. 18, 2019)		
1006	Governor Brown's Executive Order 19-08, Ensuring Equal Treatment Under Law to Oregon's LGBT+ Community (Oct. 25, 2019)		
1007	Public Knowledge Report to Gov. Kate Brown (Sept. 13, 2016)		
1008	Public Knowledge Assessment Findings Report (Dec. 15, 2023)		
1009	2018 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Mar.-Dec. 2018)		
1010	2019 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Jan.-Dec. 2019)		

No.	Description	Plaintiffs' Objections	Defendants' Response
1011	2020 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Jan.-Dec. 2020)		
1012	2021 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Jan.-Dec. 2021)		
1013	2022 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Jan.-Dec. 2022)		
1014	2023 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Jan.-Dec. 2023)		
1015	2024 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Jan.-Mar. 2024)		
1016	2018 Annual Progress & Service Report (Covering Activities July 1, 2016 - June 30, 2017) and Attachments 1-15 (Submitted June 2017)		
1017	2019 Annual Progress & Service Report (Covering Activities July 1, 2017 - June 30, 2018) and Attachments 1-18 (Submitted June 2018)		
1018	2020 Annual Progress & Service Report (Covering Activities July 1, 2018 - June 30, 2019) (Submitted June 2019)		
1019	2021 Annual Progress & Service Report and Attachments 1-41 (Submitted June 2020)		
1020	2022 Annual Progress & Service Report and		

No.	Description	Plaintiffs' Objections	Defendants' Response
	Attachments 1-38 (Submitted June 2021, Resubmitted Aug. 2021)		
1021	2023 Annual Progress & Service Report and Attachments 1-43 (Submitted June 30, 2022)		
1022	2024 Annual Progress & Service Report and Attachments 1-46 (Submitted June 30, 2023)		
1023	ODHS Child Welfare Caseload Ratio Standards (rev. 1/20/22)		
1024	Selected 2022-2024 Dept. of Human Services, Child Welfare Caseload Dashboard Screenshots	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce different or additional parts of the document, they can raise the objection during trial. • The exhibit is self-authenticating. FRE 902(5), (11), (13). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1025	2016-2022 Child Welfare Data Books (submitted 2017-2023)		

No.	Description	Plaintiffs' Objections	Defendants' Response
1026	Secretary of State Audit, Report 2018-05, Foster Care in Oregon: Chronic management failures and high caseloads jeopardize the safety of some of the state's most vulnerable children (Jan. 2018)		
1027	Secretary of State Audit, Report 2019-24, Recommendation Follow-Up Report: DHS Has Made Important Improvements, but Extensive Work Remains to Ensure Child Safety (June 2019)		
1028	Office of the Foster Care Ombuds, Fiscal Year 2021 (Nov. 16, 2021); 2023 Six Month Report (Jan. 2024)		
1029	System of Care Advisory Council, System of Care Plan for Oregon, Two-Year Strategic Plans: 2022/2023 (Nov. 1, 2021) and 2022-2025 Update (Dec. 2023)		
1030	System of Care Advisory Council Bylaws (adopted May 3, 2023)	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. • Lack of foundation. 	<ul style="list-style-type: none"> • This exhibit is relevant to plaintiffs' claims regarding healthcare needs and services of plaintiffs, particularly plaintiffs' substantive due process claim. Relevance will be established at trial. • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce different or additional parts of the document, they can

No.	Description	Plaintiffs' Objections	Defendants' Response
			<p>raise the objection during trial.</p> <ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1031	Recommendations from the Safety Workgroup, System of Care Advisory Council (May 2023)		
1032	SANKOFA Brochure	<ul style="list-style-type: none"> • Lack of foundation. • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues and misleading the trier of fact. FRE 403. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. 	<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The FRE 403 objection offers no explanation. The exhibit is not confusing, misleading, or prejudicial; it is straightforward and easy to understand. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The relevant portion is complete. Nothing additional is needed.

No.	Description	Plaintiffs' Objections	Defendants' Response
1033	Continuum of Care - Overview of Services Offered Through Oregon State Agencies (Sept. 9, 2023)	<ul style="list-style-type: none"> • Lack of Foundation. Authentication. The exhibit has not been properly authenticated. FRE 901. • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues. FRE 403. 	<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The FRE 403 objection offers no explanation. The exhibit is not confusing, misleading, or prejudicial; it is straightforward and easy to understand. A factual summary description of the services published by a state agency is not confusing, misleading, or prejudicial.
1034	CPS Assessment Fidelity Review Statewide & Comparison Reports (May 2022)		
1035	Practice Performance Reports, Oregon Continuous Quality Improvement (CQI) (2024)		

No.	Description	Plaintiffs' Objections	Defendants' Response
1036	District 12 Child Welfare Continuous Quality Improvement (CQI) Action Plan (June 15 2023), Service Strategy Deck, and Delivery Data Report (SDDR) (2023)		
1037	Midtown Child Welfare Continuous Quality Improvement (CQI) Action Plan (Sept. 28, 2023), Service Strategy Deck, and Delivery Data Report (SDDR) (2024)		
1038	Oregon Dept. of Human Services, Child Welfare Certification Quality Assurance Process & File Prep (Apr. 2023)	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues and misleading the trier of fact. FRE 403. • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. 	<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The FRE 403 objection offers no explanation. The exhibit is not confusing, misleading, or prejudicial; it is straightforward and easy to understand.. • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the

No.	Description	Plaintiffs' Objections	Defendants' Response
			exhibit, that will be raised at trial.
1039	Oregon Dept. of Human Services, Child Welfare Permanency Quality Assurance Review Tool (Mar. 2024)	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues. FRE 403. • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. 	<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The FRE 403 objection offers no explanation. The exhibit is not confusing, misleading, or prejudicial; it is straightforward and easy to understand.. • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the exhibit, that will be raised at trial.
1040	Oregon Dept. of Human Services, Child Welfare Social Service Specialist 1 (SS1) 12-Month Training Plan (Sept. 2023)		
1041	Oregon Dept. of Human Services, Child Welfare Social		

No.	Description	Plaintiffs' Objections	Defendants' Response
	Service Specialist 1 (SS1) On-Ramp (Oct. 21, 2021)		
1042	Oregon Dept. of Human Services, Child Welfare Course Summary, Applying the ADA to Your Work with Children and Families		
1043	Portland State University Child Welfare Partnership Training Unit, Trauma-Informed Practice Strategies (TIPS) for Child Welfare Workers (Mar. 28-29, 2024)		
1044	Oregon Dept. of Human Services, Child Welfare Resource Parent Training Menu (Mar. 15, 2024)		
1045	Oregon Dept. of Human Services, Child Welfare Resource Parent Training Session 4, Trauma-Related Behaviors Facilitators Guide (Mar. 2023)		
1046	Oregon Dept. of Human Services, Child Welfare Resource Parent Training Session 8, Creating a Stable, Nurturing, and Safe Home Environment Facilitators Guide (Mar. 2023)		
1047	Oregon Dept. of Human Services, Child Welfare, Independent Living Program (ILP) Transition Readiness Discussion Guide, Youth Assessment Summary, Transition Plan, and ILP Service Planning Check List		
1048	Oregon Dept. of Human Services, Child Welfare, Independent Living Program (ILP) Transition Flyers re		

No.	Description	Plaintiffs' Objections	Defendants' Response
	Services and Resources (2022-2023)		
1049	ODHS Child Welfare 2016 Procedure Manual	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues and misleading the trier of fact. FRE 403. • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. FRE 801, 802. 	<ul style="list-style-type: none"> • The exhibit is relevant to plaintiffs' substantive due process claim: It represents defendants' policies and practices, which are the heart of plaintiffs' case; the exhibit shows how defendants' policies and practices have evolved. • The exhibit is not confusing, misleading, or prejudicial, and the basis of the objection is unintelligible; the exhibit is straightforward and easy to understand. • This exhibit does not contain hearsay as it is not offered for the truth of the matters asserted. Further, this objection is premature. Even if it were hearsay, it is admissible under FRE 807.
1050	U.S. Dept. of Health & Human Services, Admin. for Children & Families, Child & Family Services Reviews (CFSR) Fact Sheet (2015)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they will use as exhibits. In any event, this is a non-party document publicly available at https://www.acf.hhs.gov/sites/default/files/

No.	Description	Plaintiffs' Objections	Defendants' Response
			documents/cb/cfsr_general_factsheet.pdf .
1051	U.S. Dept. of Health & Human Services, Admin. for Children & Families, Child & Family Services Reviews (CFSR), Statewide Assessment Instrument (Mar. 25, 2016)		
1052	U.S. Dept. of Health & Human Services, Admin. for Children & Families, Child & Family Services Reviews (CFSR), Oregon Final Report 2016 (Jan. 17, 2017)		
1053	Oregon Dept. of Human Services, Child and Family Services Review Round 3 Program Improvement Plan (PIP) (re-submitted Aug. 30, 2018)		
1054	Children's Bureau, Oregon Child and Family Services Review Round 3 Program Improvement Plan (PIP), 2018-2020 Progress Reports (Q1-Q8, Submitted 2018-2020)		
1055	Oregon Dept. of Human Services, Oregon CFSR Round 3, Non-Overlapping Period (NOP) 2020 Reports (Q1-6, Submitted 2021-2022)		
1056	Oregon Dept. of Human Services, Child Welfare, Child and Family Services Plan (CFSP) 2020-2024 and Attachments 1-22 (Submitted June 2019)		
1057	U.S. Dept. of Health & Human Services, Admin. for Children & Families, Closeout Letter to Oregon Dept. of Human Services re Program		

No.	Description	Plaintiffs' Objections	Defendants' Response
	Improvement Plan (PIP) (July 14, 2022)		
1058	U.S. Dept. of Health & Human Services, Children's Bureau, General Findings from the Federal Child and Family Services Reviews Summary of the Results of the 2001 - 2004 Child and Family Services Reviews. Retrieved from https://www.acf.hhs.gov/sites/default/files/documents/cb/summary_of_the_results_of_the_2001_2004_cfsr.pdf		
1059	U.S. Dept. of Health & Human Services, Children's Bureau, Child and Family Services Reviews (CFSR) Round 3 Statewide Data Indicators Workbook, May 2022. Retrieved from https://www.cfsrportal.acf.hhs.gov/resources/round-3-resources/cfsr-round-3-statewide-data-indicators/cfsr-round-3-statewide-data		
1060	Plaintiffs' Amended Response and Objections to Defendants' Third Set of Interrogatories (Interrogatory #5), (Mar. 14, 2024)		
1061	Child Welfare League of America, Child Welfare Consent Decrees: Analysis of Thirty-Five Court Actions from 1995 to 2005 (Oct. 2005)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Lay opinion or legal conclusion. The exhibit contains an impermissible opinion 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they will use as exhibits. In any event, this is a non-party document publicly available at https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=f4c037679162bc3

No.	Description	Plaintiffs' Objections	Defendants' Response
		<p>by a lay witness that is not helpful to determining a fact in issue, and is not based on scientific, technical, or other specialized knowledge. FRE 701; see also FRCP 26.</p> <ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<p>8d7a0cb2cf0d4764751887be6.</p> <ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(6). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The exhibit is not lay opinion; the expert witness will explain the exhibit. FRE 703. • The exhibit is relevant to plaintiffs' requested relief.
1062	Child Welfare Information Gateway, Children's Bureau, State Statutes Current Through May 2022, Definitions of Child Abuse and Neglect (2022)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they will use as exhibits. In any event, this is a non-party document publicly available at https://www.childwelfare.gov/resources/definitions-child-abuse-and-neglect-oregon/#:~:text=The%20term%20'abuse'%20includes%20negligent,or%20welfare%20of%20the%20child

No.	Description	Plaintiffs' Objections	Defendants' Response
			<ul style="list-style-type: none"> The exhibit is relevant to plaintiffs' claims regarding alleged abuse and neglect of plaintiffs and statistics about the same.
1063	Oregon Dept. of Human Services, Child Welfare, Oregon Foster Childrens Bill of Rights (July 2017)		
1064	Effective Hotline Elements: Supporting accurate and reliable screening decisions, Casey Family Programs, Strategy Brief (Nov. 2017), available at https://www.casey.org/media/Effective-hotline-elements_strategy-brief.pdf .	<ul style="list-style-type: none"> Untimely. The exhibit was not produced during discovery. Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<ul style="list-style-type: none"> No rule requires that parties produce everything in discovery that they will use as exhibits. In any event, this is a non-party document publicly available at https://www.casey.org/media/Effective-hotline-elements_strategy-brief.pdf. The exhibit is relevant to plaintiffs' claims regarding alleged abuse and neglect of children in out-of-home care and defendants' response to the same.
1065	Oregon Child Abuse Hotline (ORCAH) Child Abuse Hotline Assignment and Workload Data (Apr. 2019)		
1066	Oregon Child Abuse Hotline (ORCAH) C.A.R.E. Card, Introduction Discussion Materials, Alvarez & Marsal (Oct. 21, 2019)		

No.	Description	Plaintiffs' Objections	Defendants' Response
1067	Oregon Child Abuse Hotline (ORCAH) Sample Screening Reports (Mar. 6, 2017 & Jan. 14, 2023) – contains confidential/AEO information	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. 	<ul style="list-style-type: none"> • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the exhibit, that will be raised at trial.
1068	ORCAH Newsletter (Spring 2020)	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues and misleading the trier of fact. FRE 403. 	<ul style="list-style-type: none"> • The exhibit is relevant to plaintiffs' claims regarding alleged abuse and neglect of children in out-of-home care and defendants' response to the same. • The exhibit is not confusing, misleading, or prejudicial, thus the objection is unintelligible; the exhibit, a state published newsletter, is straightforward and easy to understand.
1069	Child Welfare Updates & Oregon Child Abuse Hotline (ORCAH) (May 10, 2021)		
1070	2022-2023 Oregon Child Abuse Hotline (ORCAH) Annual Reports		
1071	Oregon Child Abuse Hotline (ORCAH) Quarterly Report 2022, Third Quarter		
1072	Oregon Child Abuse Hotline (ORCAH) Sample Screening Report Quality Assurance Tool (Jan. 2023 & Q2 2024)	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Incomplete. The exhibit is misleading because it is incomplete 	<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.

No.	Description	Plaintiffs' Objections	Defendants' Response
		and taken out of context. FRE 106.	<ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5), (6). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the exhibit, that will be raised at trial.
1073	Oregon Child Abuse Hotline (ORCAH) Training Academy Outline (Oct. 2023)	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. FRE 901. 	<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.
1074	Oregon Dept. of Human Services, Oregon Child Abuse Hotline (ORCAH) SDM Screening and Response Time Assessment, Rule and Procedures Manuals (July 2022 & Feb. 2024)		
1075	Oregon Dept. of Human Services, Oregon Child Abuse		

No.	Description	Plaintiffs' Objections	Defendants' Response
	Hotline Continuous Quality Improvement (Jan. 16, 2020)		
1076	Oregon Child Abuse Hotline (ORCAH) Presentation (Aug. 2, 2022)		
1077	Oregon Child Abuse Hotline (ORCAH) Screening Program Presentation (Sept. 12, 2018)		
1078	Curriculum Vitae of Uma Ahluwalia, MSW, MHA		
1079	Curriculum Vitae of James Dimas		
1080	Curriculum Vitae of Bowen McBeath		
1081	Curriculum Vitae of Stacey Moss, JD, CWLS, PMP		
1082	Curriculum Vitae of Cynthia Richter-Jackson, MSW		
1083	Curriculum Vitae of Dr. Sarah Vinson, MD		
1084	Excerpt of CFSR Round 3 Statewide Data Indicators Workbook, May 2022, with work product of Jim Dimas. Originally retrieved from https://www.cfsrportal.acf.hhs.gov/resources/round-3-resources/cfsr-round-3-statewide-data-indicators/cfsr-round-3-statewide-data		
1085	Chart re Texas Third-Party Monitoring Fees Invoices	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Hearsay. The exhibit contains an out-of-court statement offered 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The exhibit is self-authenticating. FRE 902(4). The objection is premature as the

No.	Description	Plaintiffs' Objections	Defendants' Response
		<p>into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. FRE 801, 802.</p> <ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues and misleading the trier of fact. (FRE 403. 	<p>document will be authenticated by evidence and witnesses at trial. FRE 901.</p> <ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. The exhibit is admissible under FRE 1006, with the original document at Ex. 1086. • • The exhibit is admissible under FRE 803(6), FRE 803(8), FRE 807, and FRE 703. • The exhibit is relevant to the relief requested by plaintiffs. • The exhibit is not confusing, misleading, or prejudicial; as a chart of invoices, the exhibit is straightforward and easy to understand.
1086	Public Catalyst Invoices re Third-Party Monitoring in <i>M.D. v. Abbott, et al.</i> , USDC Case No. 2:11-cv-00084 (S.D. Tex.) (work performed July 2019 – Jan 2024)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The exhibit is self-authenticating. FRE

No.	Description	Plaintiffs' Objections	Defendants' Response
		<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. FRE 801, 802. • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues, misleading the trier of fact, and causing undue delay. FRE 403. 	<p>902(4). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.</p> <ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The exhibit is relevant to the relief requested by plaintiffs. • The exhibit is admissible under FRE 803(6), FRE 803(8), FRE 807, and FRE 703. • The exhibit is not confusing, misleading, or prejudicial as it is clearly straightforward invoices; the exhibit is straightforward and easy to understand.
1087	Declaration of Custodian of Records John Langford re Oklahoma Third-Party Neutral Monitoring Invoices (Apr. 11, 2024)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The exhibit is relevant to authenticate Ex. 1088. See <i>United</i>

No.	Description	Plaintiffs' Objections	Defendants' Response
			<i>States v. Kahre</i> , 610 F. Supp. 2d 1261 (D. Nev. 2009).
1088	Public Catalyst Invoices re Third-Party Neutral Monitoring in <i>D.G. v. Henry, et al.</i> , USDC Case No. 4:08-cv-00074-GKF-fhm (N.D. Okla.) (work performed July 2017 – Mar. 2024)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. FRE 801, 802. • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues, misleading the trier of fact, and causing undue delay. FRE 403. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The exhibit is self-authenticating. FRE 902(4) and FRE 902(11). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The exhibit is relevant to the relief requested by plaintiffs. • The exhibit is admissible under FRE 803(6), FRE 807, and FRE 703. • The exhibit is not confusing, misleading, or prejudicial and the objection has no intelligible basis; the exhibit is

No.	Description	Plaintiffs' Objections	Defendants' Response
			straightforward and easy to understand.
1089	Oregon Dept. of Human Services, Examples of Communicating Effectively (Individuals Who Are Blind; Individuals Who are Deaf or Hard of Hearing; People Who Have an Intellectual and Development Disabilities; People Who Have Substance Use Disorder or Alcohol Use Disorder)	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. FRE 901. 	<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.
1090	What is a Sensory Room?	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<ul style="list-style-type: none"> • The exhibit is relevant to responding to plaintiffs' claims about alleged abuse and neglect.
1091	D10 Sensory Room Instructions/Ideas (Oct. 5, 2022)	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<ul style="list-style-type: none"> • The exhibit is relevant to responding to plaintiffs' claims about alleged abuse and neglect.
1092	Oregon Dept. of Human Services, Child Welfare, Resource Parent Guide: Supporting Children & Youth with Disabilities (Mar. 7, 2024)	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. FRE 901. 	<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.

No.	Description	Plaintiffs' Objections	Defendants' Response
			<ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.
1093	Screenshots of Child Welfare Equity, Training and Workforce Development Sharepoint (15 images)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with plaintiffs. 	<ul style="list-style-type: none"> • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the exhibit, that will be raised at trial. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list.
1094	Screenshots of Child Welfare Training Sharepoint (10 images)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete 	<ul style="list-style-type: none"> • The relevant portion is complete. Nothing additional is needed.

No.	Description	Plaintiffs' Objections	Defendants' Response
		<p>and taken out of context. FRE 106.</p> <ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with plaintiffs. 	<p>If plaintiffs wish to introduce more of the exhibit, that will be raised at trial.</p> <ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list.
1095	<i>CASA for Children, et al. v. State of Oregon, et al.</i> , United States District Court for the District of Oregon, Case No. 3:16-cv-018195-YY, Final Report of the Special Master (Feb. 29, 2024) and Revised Final Order (Mar. 14, 2024)		
1096	Screenshots of Executive Dashboard, Smart Sheets Dashboard (21 images)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. • Authentication. The exhibit has not been 	<ul style="list-style-type: none"> • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the exhibit, that will be raised at trial.

No.	Description	Plaintiffs' Objections	Defendants' Response
		<p>properly authenticated. FRE 901.</p> <ul style="list-style-type: none"> • Lack of foundation. 	<ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1097	Screenshots of Executive Dashboard, Respite Care Dashboard (5 images)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with plaintiffs. 	<ul style="list-style-type: none"> • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the exhibit, that will be raised at trial. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.

No.	Description	Plaintiffs' Objections	Defendants' Response
			<ul style="list-style-type: none"> No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list.
1098	Maltreatment in Foster Care by Year Comparison (Apr. 2024)	<ul style="list-style-type: none"> Authentication. The exhibit has not been properly authenticated. FRE 901. Lack of foundation. 	<ul style="list-style-type: none"> The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1099	Oregon Dept. of Human Services, Child Welfare, Behavioral Rehabilitation Services Referral (Mar. 7, 2019) – contains confidential/AEO information		
1100	Shelter Order re Kylie & Alec – contains confidential/AEO information		
1101	Email re A and K in the press? (Apr. 16, 2019) – contains confidential/AEO information		
1102	Citizen Review Board (CRB) Findings and Recommendations re Kylie & Alec – contains confidential/AEO information		
1103	Letter to Judge from Annette Smith re Response to Court's		

No.	Description	Plaintiffs' Objections	Defendants' Response
	Criticism re Unique – contains confidential/AEO information		
1104	Testimony of Annette Smith re SB 825 (Apr. 10, 2019)		
1105	Review Judgment re Norman – contains confidential/AEO information		
1106	Citizen Review Board (CRB) Findings and Recommendations re Norman – contains confidential/AEO information		
1107	Review Judgment re Norman – contains confidential/AEO information		
1108	Screenshots of Federal Performance Dashboard, retrieved from https://www.oregon.gov/odhs/data/pages/cw-dashboard-fpm.aspx	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with plaintiffs. 	<ul style="list-style-type: none"> • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the exhibit, that will be raised at trial. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • No rule of evidence requires that parties produce everything in

No.	Description	Plaintiffs' Objections	Defendants' Response
			discovery that is included on the exhibit list. In any event, this is publicly available at https://www.oregon.gov/odhs/data/pages/cw-dashboard-fpm.aspx .
1109	Summary of 2017-Present Policy Option Package (POP) Legislative Asks from ODHS, Child Welfare	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Confusing, misleading, prejudicial. The exhibit was not produced during discovery. • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. 	<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. The exhibit is admissible under FRE 1006, with original documents at Exs. 1111-1130. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The exhibit is not confusing, misleading, or prejudicial, and thus the objection is unintelligible; the exhibit is straightforward and easy to understand.
1110	Summary of 2017-Present Policy Option Package (POP)	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been 	<ul style="list-style-type: none"> • The foundation objection is unexplained and

No.	Description	Plaintiffs' Objections	Defendants' Response
	Legislative Asks from Oregon Health Authority (OHA)	<p>properly authenticated. FRE 901.</p> <ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. 	<p>unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. The exhibit is admissible under FRE 1006, with original documents at Exs. 1111-1130.</p> <ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the exhibit, that will be raised at trial.
1111	Collection of 2017-2019 Child Welfare Agency Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they will use as exhibits; this is public information.
1112	Collection of 2017-2019 Legislatively Adopted Child Welfare Agency Budget Policy Option Packages (POP)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they

No.	Description	Plaintiffs' Objections	Defendants' Response
			will use as exhibits; this is public information.
1113	Collection of 2019-2021 Child Welfare Agency Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they will use as exhibits; this is public information.
1114	Collection of 2019-2021 Child Welfare Governor's Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they will use as exhibits; this is public information.
1115	Collection of 2019-2021 Legislatively Adopted Child Welfare Budget Policy Option Packages (POP)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they will use as exhibits; this is public information.
1116	Collection of 2019-2021 Oregon Health Authority Agency Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they will use as exhibits; this is public information.
1117	Collection of 2019-2021 Oregon Health Authority Governor's Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they will use as exhibits; this is public information.
1118	Collection of 2019-2021 Legislatively Adopted Oregon Health Authority Budget Policy Option Packages (POP)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they will use as exhibits;

No.	Description	Plaintiffs' Objections	Defendants' Response
			this is public information.
1119	Collection of 2021-2023 Child Welfare Agency Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they will use as exhibits; this is public information.
1120	Collection of 2021-2023 Child Welfare Governor's Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they will use as exhibits; this is public information.
1121	Collection of 2021-2023 Legislatively Adopted Child Welfare Budget Policy Option Packages (POP)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> • No rule requires that parties produce everything in discovery that they will use as exhibits; this is public information.
1122	Collection of 2021-2023 Oregon Health Authority Agency Budget Policy Option Package (POP) Budget Requests		
1123	Collection of 2021-2023 Oregon Health Authority Governor's Budget Policy Option Package (POP) Budget Requests		
1124	Collection of 2021-2023 Legislatively Adopted Oregon Health Authority Budget Policy Option Packages (POP)		
1125	Collection of 2023-2025 Child Welfare Agency Budget Policy Option Package (POP) Budget Requests		
1126	Collection of 2023-2025 Child Welfare Governor's Budget		

No.	Description	Plaintiffs' Objections	Defendants' Response
	Policy Option Package (POP) Budget Requests		
1127	Collection of 2023-2025 Legislatively Adopted Child Welfare Budget Policy Option Packages (POP)		
1128	Collection of 2023-2025 Oregon Health Authority Agency Budget Policy Option Package (POP) Budget Requests		
1129	Collection of 2023-2025 Oregon Health Authority Governor's Budget Policy Option Package (POP) Budget Requests		
1130	Collection of 2023-2025 Legislatively Adopted Oregon Health Authority Budget Policy Option Packages (POP)		
1131	Comparing States' Statutes on Child Welfare Jurisdiction (Nov. 6, 2023)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5), (6). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The exhibit is relevant to show how Oregon's policies and practices, and their results, can be

No.	Description	Plaintiffs' Objections	Defendants' Response
			compared and measured to other child welfare systems.
1132	Screenshots of District 2 Caseload Reports & Trends Dashboards (14 images)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Improper AEO designation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with plaintiffs. 	<ul style="list-style-type: none"> • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the exhibit, that will be raised at trial. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • AEO designations are addressed via the protective order, not exhibit objections. • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list.
1133	Screenshots of Executive Dashboards (15 images)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. 	<ul style="list-style-type: none"> • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the

No.	Description	Plaintiffs' Objections	Defendants' Response
		<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with plaintiffs. 	<p>exhibit, that will be raised at trial.</p> <ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list.
1134	Oregon Dept. of Human Services, Child Welfare, Treatment Services Referral Form (Oct. 2021)		

No.	Description	Plaintiffs' Objections	Defendants' Response
1135	2020-2024 Memoranda re Psychiatric Residential Treatment Services (PRTS) and Psychiatric Residential Treatment Facility (PRTF) Capacity (Jan. 7, 2020 – Jan. 11, 2024)	<ul style="list-style-type: none"> • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues and misleading the trier of fact. FRE 403. • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. FRE 801, 802. • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. FRE 901. 	<ul style="list-style-type: none"> • The FRE 403 objection has no explanation. The exhibit is not confusing, misleading, or prejudicial; it is a memo to the Governor and easy to understand. • The exhibit is admissible under FRE 803(6),(8), and 807. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.
1136	Oregon Dept. of Human Services, Child Welfare, Treatment Services Capacity Tracking Charts (Feb. 2024)	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. FRE 901. 	<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The exhibit is self-authenticating. FRE 902(5). The objection is

No.	Description	Plaintiffs' Objections	Defendants' Response
			premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.
1137	Oregon Dept. of Human Services, Child Welfare, Safe Sleep Checklist (Nap and Nighttime) (Jan. 2022)		
1138	Oregon Dept. of Human Services, Child Welfare, Comprehensive Statewide Plan to Prevent Child Maltreatment Fatalities (Apr. 2023)		
1139	Oregon Dept. of Human Services, Child Welfare, Youth Suicide Assessment in Various Environments (Mar. 25, 2024)		
1140	Oregon Dept. of Human Services, Child Welfare, CIRT Process Map		
1141	Oregon Dept. of Human Services, Child Fatality Prevention & Review Program, History of CIRT Assignments (Mar. 2024)		
1142	Portland State University Oregon DHS QPR Suicide Prevention Training, Pre- and Post-Training Survey Data Report (July 1, 2020 through Dec. 31, 2023) (prepared Feb. 2024)		
1143	Oregon CPS Assessment Review Outline (last modified Jan. 2024)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and

No.	Description	Plaintiffs' Objections	Defendants' Response
			witnesses at trial. FRE 901. <ul style="list-style-type: none"> The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1144	2022-2023 Child Welfare Family Preservation Accomplishments		
1145	Leveraging Intensive Family Engagement (LIFE) Final Evaluation Report: Executive Summary (Mar. 2020) and Oregon's IV-E Waiver Demonstration Project, Final Evaluation Report (Mar. 2020)		
1146	Oregon Dept. of Human Services, News Release, Oregon Selected by Doris Duke Foundation for Grant Funding Work (Mar. 11, 2024)		
1147	Oregon Health Authority Memo to Oregon State Legislature re HB 3372 Health Assessment Metrics for Foster Children (Sept. 20, 2019)		
1148	2018-2022 Oregon Health Authority CCO Metrics Annual Performance Reports (July 2019 - Aug. 2023)		
1149	2022 CCO Performance Metrics Data Dashboard		
1150	Oregon Health Authority, 2023 CCO Quality Incentive Program: Measure Summaries (Jan. 2023)		
1151	2024 Oregon Health Authority CCO Specifications for		

No.	Description	Plaintiffs' Objections	Defendants' Response
	Measure re Timely Medical and Mental Health Assessments for Children in DHS Custody (Dec. 2023)		
1152	Oregon Health Authority Coordinated Care Organization (CCO) 2.0 and DHS Service Areas Map (rev. 09/2020)		
1153	Oregon Dept. of Human Services, Child Welfare, Intake Nursing Assessment Form (CF 0174) (rev. 2023.11.01)		
1154	Oregon Dept. of Human Services, Blank CANS Worksheet Forms re 0-5 and 6-20 Years Old		
1155	HCC Log Area 2 for Nov - Dec 2023 – contains confidential/AEO information	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. FRE 901. 	<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.
1156	HCC Log Area 6 for Nov - Dec 2023 – contains confidential/AEO information	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. FRE 901. 	<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.

No.	Description	Plaintiffs' Objections	Defendants' Response
			<ul style="list-style-type: none"> The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.
1157	2022-2024 HB 2333 Reports on Psychotropic Medication to Children in Foster Care (July 2022 – Apr. 2024)	<ul style="list-style-type: none"> Mislabeled. 	<ul style="list-style-type: none"> A replacement will be provided.
1158	U.S. Dept. of Health and Human Services, Administration for Children and Families, Children's Bureau, A National Look at the Use of Congregate Care in Child Welfare (May 13, 2015)	<ul style="list-style-type: none"> Untimely. The exhibit was not produced during discovery. Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<ul style="list-style-type: none"> No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. In any event, this is a non-party document publicly available at https://www.acf.hhs.gov/sites/default/files/documents/cb/cbcongregatecare_brief.pdf. The exhibit is relevant to plaintiffs' claims, particularly substantive due process and allegations related to abuse in congregate care.
1159	Chart of Disability Diagnosis Counts, Sept. 2022 - Dec. 2023	<ul style="list-style-type: none"> Lack of foundation. Authentication. The exhibit has not been properly authenticated. FRE 901. 	<ul style="list-style-type: none"> The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.

No.	Description	Plaintiffs' Objections	Defendants' Response
			<ul style="list-style-type: none"> The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.
1160	System of Care Advisory Council Investment Update (Oct. 1, 2021)		
1161	Reunification *Case Reading Data Matrix/Phase 2 of Reviews, Seven Parts Completed by Patricia Rideout, Sue Steib, and Reviewers, and Handwritten Notes – contains confidential/AEO information	<ul style="list-style-type: none"> Plaintiffs object to the characterization of this exhibit as inaccurate and misleading. 	<ul style="list-style-type: none"> This is not an objection to the admission of the exhibit.
1162	Case Review Instrument prepared by Patricia Rideout and Sue Steib		
1163	List of Data Sources provided to Patricia Rideout and Sue Steib		
1164	Invoices for Patricia Rideout (Jan. 2023 - Jan. 2024)		
1165	Invoices for Sue Steib (Jan. 2023 - Jan. 2024) – contains confidential/AEO information		
1166	Case Review Instruments Completed by Patricia Rideout, Sue Steib, and Reviewers, and Handwritten Notes – contains confidential/AEO information		
1167	Screenshots of Family Preservation Dashboard	<ul style="list-style-type: none"> Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. 	<ul style="list-style-type: none"> The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the

No.	Description	Plaintiffs' Objections	Defendants' Response
		<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with plaintiffs. 	<p>exhibit, that will be raised at trial.</p> <ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list.
1168	Screenshots of Family Preservation Data Dashboard	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with plaintiffs. 	<ul style="list-style-type: none"> • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the exhibit, that will be raised at trial. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.

No.	Description	Plaintiffs' Objections	Defendants' Response
			<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list.
1169	Group Placements Data - Oregon (Sept. 30, 2022)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the exhibit, that will be raised at trial. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1170	Congregate Care Trends - Oregon (Apr. 3, 2022)		
1171	Chart Summarizing Child and Family Services Reviews	<ul style="list-style-type: none"> • Authentication. The exhibit has not been 	<ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The

No.	Description	Plaintiffs' Objections	Defendants' Response
	(CFSR) Round 3 Final Reports for All 50 States	<p>properly authenticated. FRE 901.</p> <ul style="list-style-type: none"> • Lack of foundation. • Untimely. The exhibit was not produced during discovery. 	<p>objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.</p> <ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. The exhibit is admissible under FRE 1006, with original document at Ex. 1172. • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. In any event, this is a non-party document publicly available at https://www.acf.hhs.gov/cb/monitoring/child-family-services-reviews/round3.
1172	Child and Family Services Reviews (CFSR) Round 3 Final Reports for All 50 States	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. • Undue delay. The exhibit's probative value is substantially outweighed by a danger of undue delay. FRE 403. 	<ul style="list-style-type: none"> • The exhibit is central plaintiffs' substantive due process claim and Adoption Assistance and Child Welfare Act claim; it contains important information about many of plaintiffs' allegations; plaintiffs

No.	Description	Plaintiffs' Objections	Defendants' Response
			<p>make allegations about CFSR findings.</p> <ul style="list-style-type: none"> • There is no danger of undue delay; this is a bench trial and the Court can understand important and detailed information.
1173	Work Culture and How to Rise Up, Equity/Rise Curriculum for Managers and Supervisors	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<ul style="list-style-type: none"> • This exhibit is relevant to rebutting plaintiffs' allegations about defendants' workforce and its care for children.
1174	Data Review of Disproportionality and Branch Trends in District 2 (2022)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1175	D2 Safety Sustainability 2024 (updated 2/27/2024)		
1176	District 2 CW Dashboard Outcomes for February 2024	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.

No.	Description	Plaintiffs' Objections	Defendants' Response
			<ul style="list-style-type: none"> The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1177	D2 Child Welfare 2023 Highlights Presentation		
1178	KEEP Services in Oregon, Oregon Social Learning Center Developments, Inc.	<ul style="list-style-type: none"> Mislabeled. 	<ul style="list-style-type: none"> A replacement will be provided.
1179	Public Knowledge® Child Welfare Experience and Qualifications, Prior Child Welfare Assessment Related Projects, Prior Projects Related to a Child Welfare Federal Class Action Lawsuit, Prior Child Welfare Projects in Oregon, and Child Welfare Experience Map	<ul style="list-style-type: none"> Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list.
1180	DHS Child Welfare Workgroup Charter: CW Statewide CQI Workgroup (04/08/21)		
1181	Child Welfare Continuous Quality Improvement (CQI) Workgroup: Recommendations for Statewide CQI Structure (Oct. 19, 2021)	<ul style="list-style-type: none"> Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<ul style="list-style-type: none"> The exhibit is relevant to rebutting plaintiffs' allegations that defendants are allowing children to be harmed.
1182	Oregon Child & Family Center for Excellence Welcome Presentation (last modified Mar. 2024)	<ul style="list-style-type: none"> Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<ul style="list-style-type: none"> The exhibit is relevant to rebutting plaintiffs' allegations that defendants are allowing children to be harmed.
1183	2021 Resource Family Retention Recruitment		

No.	Description	Plaintiffs' Objections	Defendants' Response
	Champion Team Reports (Mar. 2021 - Dec. 2021)		
1184	2022 Resource Family Retention Recruitment Champion Team Reports (Jan. 2022 - Sept. 2022)		
1185	2023 Resource Family Retention Recruitment Champion Team Reports (Jan. 2023 - Dec. 2023)		
1186	2024 Resource Family Retention Recruitment Champion Team Reports (Jan. 2024)		
1187	Dept. of Human Services, Oregon Child Welfare Racial Equity and Social Justice Workbook (Mar. 25, 2022)	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<ul style="list-style-type: none"> • This exhibit is relevant to rebutting plaintiffs' allegations that defendants are allowing children to be harmed.
1188	Email from Rebecca Jones Gaston to Aprille Flint-Gerner and Lacey Andresen re Gratitude to Team Polk (Aug. 5, 2022)	<ul style="list-style-type: none"> • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. FRE 801, 802. • Authentication. The exhibit has not been properly authenticated. FRE 901. 	<ul style="list-style-type: none"> • The exhibit is admissible under FRE 803(6) and 807. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.
1189	Child Welfare Email re Update regarding D2 CPS Assessment Surge (Oct. 27, 2022)	<ul style="list-style-type: none"> • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. FRE 801, 802. 	<ul style="list-style-type: none"> • The exhibit is admissible under FRE 803(6) and 807. • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by

No.	Description	Plaintiffs' Objections	Defendants' Response
		<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. (FRE 901) 	evidence and witnesses at trial. FRE 901.
1190	Dept. of Human Services, Demonstration Site Meeting Minutes (Jan. 10, 2023)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<ul style="list-style-type: none"> • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the exhibit, that will be raised at trial. • The exhibit is relevant to rebutting plaintiffs' allegations that defendants are allowing children to be harmed.
1191	Child Welfare District Listening Tour (Apr. 12, 2019)		
1192	Dept. of Human Services Letter to Secretary of State Kip Memmott in Response to Final Draft Audit Report (Jan. 29, 2018)		
1193	Oregon's Child, Youth & Family Continuum of Care (Mar. 6, 2018)		
1194	Press Release, Oregon Department of Human Services Announces Plan to Serve Youth in Oregon (Apr. 10, 2019)		
1195	Dept. of Human Services, Improving Child Welfare, Overview of Improvements (last updated Jan. 31, 2020)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues 	<ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.

No.	Description	Plaintiffs' Objections	Defendants' Response
		and misleading the trier of fact. FRE 403.	<ul style="list-style-type: none"> • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • The FRE 403 objection has no explanation. The exhibit is not confusing, misleading, or prejudicial as it provides a summary of Child Welfare improvements; it is straightforward and easy to understand.
1196	Dept. of Health & Human Services, Administration for Child and Families Letter to Rebecca Jones Gaston Approving PIP Extension (Aug. 31, 2020)		
1197	Dept. of Human Services, Welcome Community Partners and External Stakeholders, Budget Briefing (Dec. 11, 2020)		
1198	Dept. of Health & Human Services, Administration for Child and Families Letter to Rebecca Jones Gaston re Title IV-E Prevention Program 5-Year Plan (Apr. 1, 2021)		
1199	Screenshots of BRS Dashboard	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. FRE 106. 	<ul style="list-style-type: none"> • The relevant portion is complete. Nothing additional is needed. If plaintiffs wish to introduce more of the

No.	Description	Plaintiffs' Objections	Defendants' Response
		<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with plaintiffs. 	<p>exhibit, that will be raised at trial.</p> <ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection. • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list.
1200	Every Child 2017 Annual Report		
1201	Every Child 2018 Bi-Annual Report & Annual Report	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated and is a draft. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if

No.	Description	Plaintiffs' Objections	Defendants' Response
			plaintiffs can explain the objection.
1202	Every Child 2019 Bi-Annual Report & Annual Report		
1203	Every Child 2020 Bi-Annual Report & Annual Report		
1204	Every Child 2021 Bi-Annual Report		
1205	Every Child 2022 Mid-Year Report & Annual Report		
1206	Every Child 2023 Mid-Year Report & Annual Report		
1207	ODHS News Release re Every Child and DHS Launch My NeighbOR Emergency Response (Mar. 22, 2020)		
1208	Dept. of Human Services, Child Welfare, Safety Program Spotlight (Mar. 2023)	<ul style="list-style-type: none"> • Misabeled. • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. 	<ul style="list-style-type: none"> • A replacement will be provided. • The exhibit is relevant to rebutting plaintiffs' allegations that defendants are allowing children to be harmed.
1209	Child Specific Caregiver Supports Pilot Final Combined Data Report (May 1, 2022 - Sept. 30, 2023)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.

No.	Description	Plaintiffs' Objections	Defendants' Response
1210	2023 Comagine Health Qualified Residential Treatment Program (QRTP) Independent Assessment and Behavioral Rehabilitation Services (BRS) Eligibility Quarterly & Annual Reports		
1211	Email from Casey Family Programs Praising Gov. Kate Brown (Sept. 12, 2018)	<ul style="list-style-type: none"> • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. FRE 801, 802. • Authentication. The exhibit has not been properly authenticated. FRE 901. 	<ul style="list-style-type: none"> • The exhibit is admissible under FRE 803(1),(2),(3) and 807. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901.
1212	Governor's Children's Cabinet Meeting Packet (Sept. 29, 2021)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE 902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1213	Public Knowledge Supplemental Assessment of Services for Youth Aging Out of Foster Care (Mar. 1, 2024)	<ul style="list-style-type: none"> • Plaintiffs' objections are contained in their motion to exclude Defendants' expert. <i>See</i> Dkt. 360. 	<ul style="list-style-type: none"> • Defendants' responses to plaintiffs' objections are contained in their response to plaintiffs'

No.	Description	Plaintiffs' Objections	Defendants' Response
			motion to exclude defendants' expert.
1214	Summary of Public Knowledge Question 1: Safety - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901, • Lack of foundation. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1215	Summary of Public Knowledge Question 2: Agency Culture - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if

No.	Description	Plaintiffs' Objections	Defendants' Response
			plaintiffs can explain the objection.
1216	Summary of Public Knowledge Question 3: Data-Driven Decision Making - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1217	Summary of Public Knowledge Question 4: Recruitment, Retention, and the Support of Resource Parents - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.

No.	Description	Plaintiffs' Objections	Defendants' Response
1218	Summary of Public Knowledge Question 5: Permanence - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1219	Summary of Public Knowledge Question 6: Permanency Planning - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of Foundation. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.

No.	Description	Plaintiffs' Objections	Defendants' Response
1220	Summary of Public Knowledge Question 7: Individual Assessments - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1221	Summary of Public Knowledge Question 8: Service Provision - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.

No.	Description	Plaintiffs' Objections	Defendants' Response
1222	Summary of Public Knowledge Question 9: Case Planning - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1223	Summary of Public Knowledge Question 10: Preserving and Improving Connections Between Children and Their Families - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.

No.	Description	Plaintiffs' Objections	Defendants' Response
1224	Summary of Public Knowledge Question 11: Staffing Resources - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1225	Summary of Public Knowledge Question 12: Independent Living - Findings & Inquiry Protocols (PK Report 3/1/24)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. 	<ul style="list-style-type: none"> • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1226	Moving from a Culture of Compliance and Risk-	<ul style="list-style-type: none"> • Authentication. The exhibit has not been 	<ul style="list-style-type: none"> • The exhibit is self-authenticating. FRE

No.	Description	Plaintiffs' Objections	Defendants' Response
	Avoidance to Continuous Quality Improvement (Nov. 2023)	properly authenticated. FRE 901. • Lack of Foundation.	902(5). The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if plaintiffs can explain the objection.
1227	Transcript of Episode 12, Our Oregon DHS, COVID-19 Update (June 11, 2020), retrieved from https://sharedsystems.dhsoha.state.or.us/DHSForms/Served/DE%20COVID-19%20EP12.pdf .	• Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402.	• The exhibit is relevant to plaintiffs' claims and defendants' defenses regarding the ability of defendants to care for children in their care.
1228	Dept. of Health and Human Services, Administration for Children & Families, Letter to Child Welfare Leaders re COVID-19 Guidance (Mar. 18, 2020)		
1229	Certified Copy of Order re Naomi B. - contains confidential/AEO information		
1230	Certified Copy of Order re Kylie R. - contains confidential/AEO information		
1231	Certified Copy of Order re Alec R. - contains confidential/AEO information		

No.	Description	Plaintiffs' Objections	Defendants' Response
1232	Certified Copy of Judgment re Norman N. - contains confidential/AEO information		
1233	Certified Copy of Order and Judgment re Ruth T. - contains confidential/AEO information		
1234	Certified Copy of Judgment re Wyatt B. - contains confidential/AEO information		
1235	Certified Copy of Judgment re Noah F. - contains confidential/AEO information		
1236	Certified Copy of Order and Judgment re Unique L. - contains confidential/AEO information		
1237	Certified Copy of Orders, Motion, and Judgments re Simon S. - contains confidential/AEO information		
1238	Certified Copy of Order re Bernard C. - contains confidential/AEO information		
1239	Photographs - contains confidential/AEO information	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. FRE 401, 402. • Authentication. The exhibit has not been properly authenticated. FRE 901. • Lack of foundation. • Untimely. The exhibit was not produced during discovery. 	<ul style="list-style-type: none"> • The exhibit is relevant to rebut claims about the conditions of children in defendants' care. • The objection is premature as the document will be authenticated by evidence and witnesses at trial. FRE 901. • The foundation objection is unexplained and unintelligible in this context. Defendants will respond if

No.	Description	Plaintiffs' Objections	Defendants' Response
			plaintiffs can explain the objection. • No rule of evidence requires that parties produce everything in discovery that is included on the exhibit list.

DATED: April 29, 2024

ELLEN ROSENBLUM
 ATTORNEY GENERAL
 FOR THE STATE OF OREGON

s/ Harry B. Wilson

David B. Markowitz, OSB #742046
 DavidMarkowitz@MarkowitzHerbold.com
 Laura Salerno Owens, OSB #076230
 LauraSalerno@MarkowitzHerbold.com
 Harry B. Wilson, OSB #077214
 HarryWilson@MarkowitzHerbold.com
 Lauren F. Blaesing, OSB #113305
 LaurenBlaesing@MarkowitzHerbold.com
 Vivek A. Kothari, OSB #182089
 VivekKothari@MarkowitzHerbold.com
Special Assistant Attorneys General for Defendants

Adele J. Ridenour, OSB #061556
 AdeleRidenour@MarkowitzHerbold.com
Of Attorneys for Defendants

Carla A. Scott, OSB #054725
 carla.a.scott@doj.state.or.us
 Sheila H. Potter, OSB #993485
 sheila.potter@doj.state.or.us
Of Attorneys for Defendants

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